

From: [Bill Jacobs](#)
To: Steve_Ebbert@fws.gov
Subject: Re: Rat Island Panel Review
Date: 02/01/2011 02:50 PM

Thank you for this note and sending your paper along.

From somewhere, I was sent a link to Terry Salmon's report and have read it. Since hearing about the loss of eagles, I have wondered to what extent traditional eagle-nesting sites continue to have adult eagles on them (especially in the Rat group of islands).

▼ Steve_Ebbert---02/01/2011 02:42:31 PM---Hello Bill, Peter D brought my attention that you were not sent the Ornithological

From: Steve_Ebbert@fws.gov
To: Bill Jacobs/DC/USEPA/US@EPA
Date: 02/01/2011 02:42 PM
Subject: Rat Island Panel Review

Hello Bill,

Peter D brought my attention that you were not sent the Ornithological Council's report on their panel review about the large, unexpected avian mortality on Rat Island after the 2008 aerial broadcast of brodifacoum bait.

That report was complete in mid-December 2010, and the partners agreed to post the report on each organization's website. FWS web-posted it in January (although at the time of this writing neither of the partners have posted it their websites). The report was also posted recently on the cooperative website, seabirdrestoration.org.

The refuge decided to send the report, or link to it, by email to agencies that provided the FWS relevant permits for the eradication, and John E at NWRC also was sent the link because it was relevant to our Adverse Impact Report. And you should have received an announcement and link as soon as the document was available, but did not. As one starting point for distribution about the news of the panel review report's availability, I suggested using the same distribution list created by Stacey B to send out the original Rat Island Operation report in Aug 2009. However, that list was shortened for the purposes of notification of the review report.

Attached is the unpublished paper I presented at the Vertebrate Pest Conference in Feb 2010. As you know, the proceedings have not been printed, but I expect little or no change in the paper attached below.

Last week the FWS conducted a meeting in Honolulu to discuss eradication of vertebrate invasive species on islands. A lot of time was devoted to discussing rodenticide issues. The Rat Island was used as an example several times, and

the panel report was distributed as a handout by the meeting organizers. A FWS LE agent from Hawaii specifically addressed the Rat Island incident and its impact on current and future enforcement of label violations, and infractions of the Migratory Bird Act and Bald and Golden Eagle Protection Act. Beth F presented a talk about the proposed eradication on Palmyra. I understand rodenticide risks to nontarget birds is currently being discussed on the Pacific Seabird Group's Listserv by members.

If you have any questions regarding the Rat Island nontarget mortality, please do not hesitate to ask. I think this refuge, and FWS as a whole, can do better.

(See attached file: Anticoagulant Residual Concentration and Poisoning in Birds 11-30-10 in review.pdf)

Rat Island Mortality Panel Review Report:
<http://alaska.fws.gov/ratislandreview-final.pdf>

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"The key finding is that Island Conservation, the group based in Santa Cruz, California, that led the operation, applied poison in excess of that recommended by an advisory panel and probably above the legal limit approved by the US Environmental Protection Agency (EPA)." - Nature.com[attachment "Anticoagulant Residual Concentration and Poisoning in Birds 11-30-10 in review.pdf" deleted by Bill Jacobs/DC/USEPA/US]